

Laura Vartain Horn (SBN 258485)  
**KIRKLAND & ELLIS LLP**  
555 California Street, Suite 2700  
San Francisco, CA 94104  
Telephone: (415) 439-1625  
[laura.vartain@kirkland.com](mailto:laura.vartain@kirkland.com)

Allison M. Brown (Admitted *Pro Hac Vice*)  
**KIRKLAND & ELLIS LLP**  
2005 Market Street, Suite 1000  
Philadelphia, PA 19103  
Telephone: (215) 268-5000  
alli.brown@kirkland.com

Jessica Davidson (Admitted *Pro Hac Vice*)  
**KIRKLAND & ELLIS LLP**  
601 Lexington Avenue  
New York, NY 10022  
Telephone: (212) 446-4800  
[jessica.davidson@kirkland.com](mailto:jessica.davidson@kirkland.com)

*Attorneys for Defendants*  
UBER TECHNOLOGIES, INC., RASIER, LLC,  
And RASIER-CA, LLC

**UNITED STATES DISTRICT COURT**

# **NORTHERN DISTRICT OF CALIFORNIA**

## **SAN FRANCISCO DIVISION**

**IN RE: UBER TECHNOLOGIES, INC.,  
PASSENGER SEXUAL ASSAULT  
LITIGATION**

Case No. 3:23-md-03084-CRB (LJC)

### This Document Relates to:

*Jaylynn Dean v. Uber Techs., Inc.,*  
No. 23-cv-06708

**DECLARATION OF LAURA VARTAIN  
HORN IN SUPPORT OF DEFENDANTS  
UBER TECHNOLOGIES, INC., RASIER,  
LLC, AND RASIER-CA, LLC'S  
OPPOSITION TO PLAINTIFFS' MOTION  
TO EXCLUDE EXPERT TESTIMONY**

Judge: Hon. Charles R. Breyer  
Courtroom: 6 – 17th Floor

Judge: Mag. Lisa J. Cisneros  
Courtroom: G – 15th Floor

I, Laura Vartain Horn, declare as follows:

1. I am an attorney at law duly admitted to practice before the courts of the State of California and a partner with the law firm of Kirkland & Ellis LLP, counsel of record for Defendants Uber Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC (collectively, “Uber”) in this action. I have personal knowledge of each and all of the facts stated in this declaration and, if called as a witness, could and would competently testify to the facts contained herein.

2. Attached as **Exhibit 1** is a true and correct copy of excerpts of the September 19, 2025 Trial Transcript in the JCCP matter.

3. Attached as **Exhibit 2** is a true and correct copy of Uber: Trust & Safety Foundational Wave – U.S., bates stamped UBER-MDL3084-000067582 through 000067633.

4. Attached as **Exhibit 3** is a true and correct copy of the June 2017 Uber Trust & Safety Quant, bates stamped UBER JCCP MDL 001102150.

5. Attached as **Exhibit 4** is a true and correct copy of the September 25, 2025 Report of David C. Sawyer.

6. Attached as **Exhibit 5** is a true and correct copy of excerpts of the July 23, 2025 Deposition Transcript of Hassan Turay.

7. Attached as **Exhibit 6** is a true and correct copy of the August 29, 2025 JCCP Order on Parties' Motions in Limine and Motions to Exclude Expert Opinions.

I declare under penalty of perjury under the laws of the United States and the State of California that the foregoing is true and correct.

Executed on December 10, 2025, in San Francisco, California.

*/s/ Laura Vartain Horn*

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Laura Vartain Horn

## E-FILING ATTESTATION

I, Laura Vartain Horn, am the ECF User whose ID and password are being used to file this document. In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that each of the signatories identified above has concurred in this filing.

/s/ Laura Vartain Horn  
Laura Vartain Horn